

**Blue Range Mexican Wolf Reintroduction Project  
Adaptive Management Oversight Committee  
Standard Operating Procedure 11.0 - Clarification Memo**

**Title:** Depredation on Domestic Livestock and Pets

**Number:** 11.0

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**Purpose:** The purpose of this memo is to clarify how SOP 11.0 shall be implemented henceforth, in an ongoing adaptive management approach that gives due consideration to providing intended wolf management flexibility while adequately and appropriately resolving conflicts with other interests. These clarifications are based on experience to date in the Project and have been discussed and agreed to by AMOC and the Lead Agency Directors.

**Clarifications consist of the following:**

- 1) The Project Cooperators' overall objectives in implementing SOP 11.0 are to ensure that:
  - a. on-site investigations of reported wolf depredations warranting investigation begin within 24 hours of initial notification that a depredation might have occurred; and
  - b. investigations are completed and reported in thorough, accurate, and timely fashion to better inform management decisions.
- 2) When an IFT member, regardless of duty station or agency of employment, is notified of possible Mexican wolf depredation requiring on-site investigation, they shall immediately:
  - a. notify the Jurisdictional IFTL and USFWS Field Projects Coordinator (FPC) or their respective designees;
  - b. ensure that an IFT Incident Investigator (typically a WS employee) is dispatched; and
  - c. affirm whether the FPC/designee will dispatch a USFWS employee to co-investigate the alleged incident with the assigned IFT Incident Investigator, and then apprise the Jurisdictional IFTL/designee of the decision.
- 3) If co-investigation is directed by USFWS, the IFT Incident Investigator and the USFWS Co-investigator shall be jointly responsible for cooperating to initiate and conduct their parallel investigations, with every effort made to arrive on-site together. If necessary to accommodate the USFWS Co-investigator, and if weather and other conditions (e.g. carcass condition and expected rate of degradation) permit, the IFT Investigator may delay on-site investigation for up to 12 hours after initial notification. However, if the USFWS Co-investigator is unable to arrive on-site until more than 12 hours after initial notification, or if conditions such as inclement weather or carcass degradation threaten integrity of the investigation, the IFT Investigator shall proceed with on-site investigation (e.g. examining the scene and documenting evidence) immediately upon arrival and manage the scene to enable effective co-investigation when the USFWS Co-investigator does arrive.
- 4) If a livestock owner/operator denies access for incident investigation or co-investigation, the IFT Incident Investigator and/or the USFWS Co-investigator shall immediately notify the

Recovery Coordinator/designee, FPC/designee, and the Jurisdictional IFTL/designee of that denial. Note: a livestock owner/operator has no legal authority to deny agency access to sites on public lands, but, under State Law in AZ and NM, livestock, whether live or dead, remain the property of the owner and the owner may deny agency access to the live animal or carcass itself (e.g. for handling, sampling). However, on private lands the landowner does have the legal right to deny access to agencies (except in a properly authorized law enforcement investigation).

- 5) At the scene of the reported depredation:
  - a. The IFT Incident Investigator shall conduct the SOP 11.0 investigation. The USFWS Co-investigator may offer verbal comment on possible wolf involvement or lack thereof, but the IFT Incident Investigator alone shall determine, based on the evidence and consultation with other IFT members and any other appropriate resources, whether the depredation was caused by a Mexican wolf or wolves or by some other species or some other cause unrelated to wildlife depredation (lightning, fall, etc.).
  - b. The USFWS Co-investigator shall evaluate biological circumstances surrounding the event to determine, if possible, and if the IFT Incident Investigator determines that a Mexican wolf depredation did occur, “Why did a wolf or wolves depredate on this particular animal at this particular time in this particular place?”
- 6) The IFT Incident Investigator shall:
  - a. verbally notify the Jurisdictional IFTL/designee and the FPC/designee of their final determination of a “confirmed” or “probable” Mexican wolf depredation within 48 hours of the original notification of the possible incident; and
  - b. submit (per SOP 11.0, 7.a) a final written Depredation Incident Report Form (see Attachment A) to the IFT’s Alpine office within 14 calendar days of the initial notification.
- 7) The USFWS Co-investigator shall:
  - a. verbally inform the USFWS FPC/designee of their determination regarding factors contributing to causing a “confirmed” or “probable” Mexican wolf depredation within 48 hours of initial notification of the possible incident; and
  - b. submit a written report on their final determination to the FPC/designee and the Recovery Coordinator/designee within 72 hours of the initial notification.
- 8) While receiving the IFT Incident Investigator’s 48-hour verbal report, the Jurisdictional IFTL/designee shall initiate a Jurisdictional IFTL Checklist for Assigning Depredation Incidents (Attachment B). The Jurisdictional IFTL shall be responsible for contacting IFT members and other sources of relevant information as necessary to complete the form (Note: if differences of viewpoint among the IFT on assigning the depredation to a specific wolf or wolves are sufficient to warrant discussion or decision at a higher level, the FPC will ask AMOC for assistance). The Checklist shall incorporate and appropriately reference any USFWS decision (see Clarification 11, below) resulting from co-investigation of the reported depredation, and clearly indicate whether the reported depredation has been determined to be a depredation incident as defined in SOP 13.0: Control of Mexican Wolves.

- 9) After completing a Checklist, the Jurisdictional IFTL/designee shall immediately coordinate with the FPC and other IFTLs to initiate discussion and decisions regarding the appropriate management response(s) under SOP 13.0, within the timeframes prescribed in SOP 13.0.
- 10) The Jurisdictional IFTL/designee shall immediately file the completed Checklist with the IFT Alpine office, and initiate integration of the information into Project depredation databases, records, and files and into ongoing IFT analyses of dynamics between wolves and livestock, for development of better mechanisms by which to prevent or mitigate wolf depredation.
- 11) Within 24 hours of receiving a Co-investigator's written report on a confirmed Mexican wolf lethal depredation, the Recovery Coordinator/designee shall inform the AMOC Chair, FPC, and Jurisdictional IFTL of the USFWS decision on whether, due to livestock owner/operator denial of investigative access or occurrence of intentional attraction or repeated knowing attraction of wolves, a depredation incident shall not be assigned under SOP 13.0.
- 12) Within 14 calendar days of completing evaluation of the USFWS Co-investigator's written report, the FPC/designee and Jurisdictional IFTL/designee shall ensure integration of all non-confidential information on biological aspects of the incident into ongoing IFT analyses of the dynamics between wolves and livestock, for development of better mechanisms by which to prevent and/or mitigate wolf depredation.
- 13) The requirements above apply equally to public, state, and private lands, but they do not apply to Tribal lands (the latter including WMAT and SCAT lands) unless the appropriate Tribal authority voluntarily adopts them within the framework of their USFWS-approved wolf management plan.
- 14) Upon approval of this Clarification Memo, the AMOC Chair shall immediately incorporate an updated Depredation Report Form (Attachment A) into SOP 11.0, as Appendix A.

**Rationale:** Clarifications 1-12 address core issues in how on-site investigations are handled, from initiation through reporting to management decision and application. Timely verification of reported wolf depredations is fundamental to determining the appropriate management response(s) pursuant to SOP 13.0: Control of Mexican Wolves, and must be appropriately documented in Project records and recommendations. More information on biological aspects of depredation is needed to better enable the Project to identify proactive measures that can be taken to promote growth of the wolf population while reducing wolf impacts on livestock operators/owners. The responsibilities of the IFT Incident Investigator and the USFWS Co-Investigator and conduct (and application of the results) of their investigations are different, though overlapping. The former is focused on determining what happened, and the latter is focused on why it happened and how that information might be used to reduce the likelihood of recurrence. However, IFT investigative response within 24 hours of initial notification is the primary Project objective in these situations, thus the USFWS decision on (and initiation of) co-investigation must occur within the first 12 hours. Moreover, in some situations (e.g. inclement weather) even a 12-hour delay might diminish the likelihood of successful investigation; the IFT Investigator must have the latitude to proceed immediately in such situations. The timeframes for investigation and particularly co-investigation reporting are necessarily short, to ensure

information is available within the time allotted for the IFT, AMOC, and the Directors to develop, recommend, approve, and implement management response(s).

Clarifications 4 and 11: If a livestock operator/owner denies access to Project-affiliated staff conducting SOP 11.0 investigations or co-investigations, the IFT would not be able to determine whether a confirmed depredation incident (per SOP 13.0) occurred. This would complicate and thus impede developing and implementing informed management decisions under SOP 13.0.

Clarification 13: No Project SOP applies to Tribal lands unless the appropriate Tribal authority and USFWS have agreed to implement it as a component of their cooperative wolf management framework for specified Tribal lands.

Clarification 14: The Project's standard Depredation Report Form must be revised to delete "possible wolf predation" as a determination category, because it is too broad and speculative to be useful. The remaining determination categories adequately and accurately cover all relevant scenarios.

**Approvals:**

The Mexican Wolf Blue Range Reintroduction Project Adaptive Management Oversight Committee approved this SOP (with Lead Agency Director concurrence) on xxx.

**Attachments:**

- A. Depredation Report Form
- B. Jurisdictional IFTL Checklist for Assigning Depredation Incidents

## Attachment A

## DEPREDATION REPORT FORM

Resource Owner:																			
Mailing Address:																			
Phone:		County:		Ranch Name:															
<b>SITE DESCRIPTION:</b>																			
Nearest Town:				Allotment Name (if applicable):															
Approximate Location:																			
Coordinates:	UTMN:				UTME:														
Elevation:				Slope %:				Aspect:											
Vegetative Cover:																			
Topography (riparian, S. slope, bench, etc.):																			
General Description of Area:																			
Date Complaint Received:					Date Investigated:														
Land Ownership:	<input type="checkbox"/>	Private	<input type="checkbox"/>	FS	<input type="checkbox"/>	BLM	<input type="checkbox"/>	State	<input type="checkbox"/>	Tribal	<input type="checkbox"/>	Other:	<input type="checkbox"/>						
Type of animal:	<input type="checkbox"/>	Sheep	<input type="checkbox"/>	Lamb	<input type="checkbox"/>	Bull	<input type="checkbox"/>	Cow	<input type="checkbox"/>	Calf	<input type="checkbox"/>	Horse	<input type="checkbox"/>	Colt	<input type="checkbox"/>	Dog	<input type="checkbox"/>	Other:	<input type="checkbox"/>
Number of Animals Depredated:																			
Damage Type:	<input type="checkbox"/>	Killed	<input type="checkbox"/>	Injured	<input type="checkbox"/>	Harassment	<input type="checkbox"/>	Stillborn	<input type="checkbox"/>	Other:									
Breed:																			
Ear Tag Number:																			
Sex:																			
Estimated time since death or injury:																			
Estimated Age of Resource:																			
Are there other livestock in the area?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No															
Describe (how many, behavior, composition, distance from mortality).																			
<b>EVIDENCE:</b>																			
Detection Method:	<input type="checkbox"/>	Report from owner	<input type="checkbox"/>	Birds	<input type="checkbox"/>	Other:													
Carnivore Tracks Present:	<input type="checkbox"/>	Mexican Wolf	<input type="checkbox"/>	Coyote	<input type="checkbox"/>	Mt. Lion	<input type="checkbox"/>	Black Bear	<input type="checkbox"/>	Other:									
Scat Present:	<input type="checkbox"/>	Mexican Wolf	<input type="checkbox"/>	Coyote	<input type="checkbox"/>	Mt. Lion	<input type="checkbox"/>	Black Bear	<input type="checkbox"/>	Other:									
Carnivores observed in area? Describe:																			
Carcass hidden or in the open? Describe:																			

Attachment A. Continued.

DEPREDAATION REPORT FORM

Carcass Covered?	Yes	No	
Carcass Moved?	Yes	No	
Drag marks present?	Yes	No	
Collared Wolves in area?	Yes	No	If Yes, then number:
Blood on Vegetation?	Yes	No	Describe:
Apparent point of first feeding:			
Percentage of Carcass Remaining			
0-25%--No soft tissue, hide present, disarticulated.			
26-50%--All organs consumed, all or most of quarters consumed, partial disarticulation.			
51-75%--All organs and portions of the hind quarters consumed, front quarters and neck intact, articulated.			
76-100%--some organs consumed, most soft tissue intact, skeleton articulated.			
Describe any additional evidence that is discovered in the area:			
Describe hemorrhages and corresponding marks seen while skinning the hide or other abnormalities (Location and type, e.g. claw marks on right hind leg, or canine marks on neck):			
Canine spread (if applicable): mm			
Cause of Damage:			
Confirmed	Carnivore (list species):		
Probable			
Accident			
Unknown			
Other:			
<b>ADDITIONAL INFORMATION:</b>			
Were photos taken of the site?	Yes	No	Attached?
Was a veterinarian involved in cause of death determination?	Yes	No	
If yes, is a veterinarian report attached?	Yes	No	
<b>SUMMARY OF INCIDENT</b> (including preface and actions taken):			
Lead Investigator:			

Attachment B

Jurisdictional IFTL Checklist for Assigning Depredation Incidents

(Note: this form is to be completed by the Jurisdictional IFTL/designee in discussion with an IFT Incident Investigator verbally reporting a 48-hr finding on a wolf depredation)

1	Date of SOP 11.0 investigation and name of IFT Investigator	
2	Type of livestock and number	
3	Estimated time/date of kill(s) and/or injuries	
4	Number of carcasses and distance(s) apart	
5	Bite marks – number and measurements	
6	Hemorrhaging	
7	Blood evidence	
8	Scat/tracks on site	
9	On-the-ground telemetry (who, time, date, results)	
10	Carcass(es) – estimated weight(s) and % consumed	
11	Most recent telemetry flight information (date, results)	
12	Distance to den	
13	Lawful presence of livestock (yes/no, date of affirmation)	
14	IFT Investigator decision on wolf kill or no wolf kill	
15	Jurisdictional IFTL decision on responsible wolf or wolves	
16	USFWS decision on eligibility for depredation incident	
17	Other comments	
18	Contacts for this Checklist:	Name(s) and Date(s)
	AGFD	
	NMDGF	
	USFS	
	USFWS	
	WMAT	
	WS	
	Permittee/Landowner	
19	Checklist completed by/date	